

**Kaplan Papadakis & Gournis, P.C.**

180 North LaSalle Street  
Suite 2108  
Chicago, IL 60601  
Telephone: 312.726.0531  
Fax: 312.726.4928  
KP&G FEIN NO. 36-4121162

Joshua Tracz, Controller  
EquityExperts.org, LLC  
2391 Pontiac Rd.  
Auburn Hills, MI 48326

February 18, 2020

Invoice # 25872

**In Reference To:**

**Renell Reed-Farmer**

## Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
1/21/2020 SB	Telephone conference with K. DeMarte regarding the upcoming court conference. (.2) Attendance via telephone at the Court conference. (.5) Reviewed and analyzed the complaint and answer, including drafting an initial timeline for the trial notebook. (1.0) Detailed review and analysis of the jury instructions and verdict form, including adding relevant factual and legal issues to the trial notebook. (1.2) Detailed review and analysis of the joint final pretrial order, including adding relevant facts and legal issues to the trial notebook. (1.5) Intensive review and analysis of Sparks v. EquityExperts, including drafting a detailed analysis of the facts stated and legal issues decided in that case for the trial notebook. (1.0) Legal research and review of research relevant to cases decided since Sparks in 6th Circuit courts to determine if any of them are legally or factually similar enough to potentially affect the outcome at trial. (1.3)	6.70 \$300.00/hr	2,010.00
1/22/2020 SB	Reviewed defense counsel's responses to motions for summary judgments in other Equity Experts cases to analyze their likely factual and legal defenses at trial, as well as any issues Equity Experts should cover in direct examinations in order to strategically address issues that may be negative for Equity Experts. (1.3) Detailed review and analysis of the documents sent to me by K. DeMarte, including, but not limited to, drafting an analysis of each document including where it can be found and its contents for use at trial. (3.0). Continued drafting, editing and reviewing documents for the trial notebook including reviewing and making notes on cases previously cited by Defendants against Equity Experts. (1.3)	5.60 \$300.00/hr	1,680.00
1/23/2020 SB	Telephone call with K. DeMarte regarding drafting a Sparks brief and other work to be done by me today.	0.20 \$300.00/hr	60.00

***Please refer to Invoice Number when paying.***

Joshua Tracz, Controller

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
1/23/2020	SB Began drafting, editing and reviewing a motion for judgment as a matter of law based on the Sparks case. (1.3) Reviewed the Sparks, Truhn and Owens cases. (1.0) Telephone call with K. DeMarte regarding strategy relevant to motions for judgment as a matter of law. (.3) Reviewed and analyze K. DeMarte's draft opening statement, including providing my professional opinion on and notes on her draft. (1.8) Detailed review of the impeachment exhibits sent to me by K. DeMarte. (1.2) Legal research relating to judicial estoppel in the 6th Circuit and in SCOTUS decisions. (2.0) Detailed review and analysis of Plaintiff's bankruptcy filings, including, but not limited to, a review of the docket, a review of her petition, and an intensive review of her schedules. (1.3)	8.90 \$300.00/hr	2,670.00
1/24/2020	SB Began drafting, editing and reviewing a trial brief relating to judicial estoppel barring Plaintiff's claims. (3.0) Drafted, edited and reviewed an argument to the court regarding the motion for judgment as a matter of law based on judicial estoppel, including detailed research of and analysis of cases decided by the trial judge in our case. (2.4) Finalized drafting, editing and reviewing the judgment as a matter of law based on judicial estoppel, including, but not limited to, correspondence with K. DeMarte regarding her suggestions and J. Garafalo's suggestions regarding the contents of the brief. (1.3) Began reviewing and gathering the exhibits to the trial brief regarding judicial estoppel barring Plaintiff's claims. (.8) Reviewed the final bound brief to ensure all exhibits are included. (.6)	8.10 \$300.00/hr	2,430.00
1/25/2020	SB Legal research and review of research relative to the issues presented in the Sparks opinion, the Thrun opinion (issued by the judge conducting the trial), and the Owens v. EquityExperts opinion. Drafted, edited and reviewed a detailed analysis of these three cases in preparation for any of the issues presented by any of the cases being raised at trial.	2.30 \$300.00/hr	690.00
1/26/2020	SB Reviewed and analyzed the trial transcript from the Sparks trial.	2.00 \$300.00/hr	600.00
	SB Travel from Chicago to Detroit. (2.5 non-working hours at half time.)	2.50 \$150.00/hr	375.00
1/27/2020	SB Preparation for and appearance at trial, including, but not limited to, providing my professional opinion on voir dire and jury members to strike, participating in sidebar conferences with the court, fact checking Plaintiff's counsel's opening statement and direct examination of Plaintiff, conferencing with K. DeMarte and J. Galofaro regarding strategy regarding voir dire, Plaintiff's testimony, filling the brief regarding judgment as a matter of law, and regarding J. Garofalo's testimony on Tuesday.	8.00 \$300.00/hr	2,400.00
1/28/2020	SB Preparation for and appearance at trial, including, but not limited to, providing my professional opinion on J. Garofalo's testimony on direct, on G. Nitzkin's cross examination of J. Garofalo, participating in sidebar conferences with the court, fact checking Plaintiff's	8.00 \$300.00/hr	2,400.00

***Please refer to Invoice Number when paying.***

Joshua Tracz, Controller

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
	counsel's cross examination of J. Garofalo, conferencing with K. DeMarte and J. Galofaro regarding strategy regarding trial strategy, conducting argument to the Court regarding judgment as a matter of law, regarding J. Garofalo's testimony on Tuesday, and regarding EquityExperts' case-in-chief, and regarding closing arguments.		
1/29/2020	SB Preparation for and appearance at trial, including, but not limited to, conducting arguments regarding jury instructions, participating in sidebar conferences with the court, fact checking K. DeMarte's direct and Plaintiff's counsel's cross examination of J. Garofalo, conferencing with K. DeMarte and J. Galofaro regarding trial strategy, and providing my professional opinion and thoughts on EquityExperts' closing arguments.	8.00 \$300.00/hr	2,400.00
	SB Travel from Detroit to Chicago (5.5 hours billed at half my hourly rate).	5.50 \$150.00/hr	825.00
1/30/2020	SB Telephone call with K. DeMarte and J. Galofaro regarding the verdict.	0.40 \$300.00/hr	120.00
	For professional services rendered	66.20	\$18,660.00
	Balance due		\$18,660.00

## Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Stacie Barhorst	58.20	300.00	\$17,460.00
Stacie Barhorst	8.00	150.00	\$1,200.00

***Please refer to Invoice Number when paying.***